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14 UNITED STATES DISTRICT COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA

17 JAVIER AGUSTO ALVAREZ,

18 Plaintiff,

19 v.

20 SONOMA COUNTY, JULIE S. PAIK, LISA
21 M. CERVANTES, ANNA NEW, JAN C.
22 STURLA, MEGAN F. ALVAREZ,
23 EXCHANGE BANK and DOES 1 through 50,
24 INCLUSIVE,

25 Defendants.

Case No. C 12-5606 (EMC)

**STIPULATED REQUEST TO CONTINUE
EARLY NEUTRAL EVALUATION AND
[PROPOSED] ORDER**

Hon. Edward M. Chen

STIPULATION

26 The parties, Plaintiff JAVIER ALVAREZ and Defendants COUNTY OF SONOMA, JULIE S.
27 PAIK, S. SULLIVAN, LAURIE LAPIDUS and ANNA NEW (hereinafter "Sonoma Defendants"), by
28 and through their attorney of record, hereby stipulate as follows:

1. On May 16, 2013, the Court referred this matter to Early Neutral Evaluation (ENE) within
90 days. (Docket No. 35.)

2. On June 4, 2013, the Court assigned Marjorie Gelb as the Evaluator for this case. (Docket No. 40.) The ENE was scheduled for August 1, 2013.

3. On June 28, 2013, Plaintiff ALVAREZ filed a second amended complaint containing new allegations and naming additional defendants. (Docket No. 41.)

4. On July 12, 2013, Sonoma Defendants filed a motion to dismiss Plaintiff's second amended complaint. (Docket No. 45.)

5. On July 17, 2013, Richard Osman, counsel for Sonoma Defendants, contacted Plaintiff ALVAREZ to meet and confer regarding continuing the ENE for 60 days in order to accommodate the pending motion to dismiss. Plaintiff ALVAREZ agreed to extend the ENE for 60 days.

6. On July 18, 2013, Sheila Crawford, counsel for Sonoma Defendants, contacted the Evaluator, Marjorie Gelb, to discuss continuing the ENE. Given the current status of this matter, Ms. Gelb agreed continuing the ENE for 60 days was reasonable.

7. The Parties respectfully request that the Court approve this stipulation and continue the ENE for 60 days from August 14, 2013.

IT IS SO STIPULATED.

Dated: July 22, 2013

BERTRAND, FOX & ELLIOT

By: /s/ Sheila D. Crawford
Sheila D. Crawford
Richard W. Osman
Attorneys for Defendants
COUNTY OF SONOMA, JULIE S. PAIK,
S. SULLIVAN, LAURIE LAPIDUS and ANNA
NEW

Dated: July 22, 2013

Plaintiff, *In Pro Per*

By: /s/ Javier Alvarez
Javier Alvarez
Plaintiff

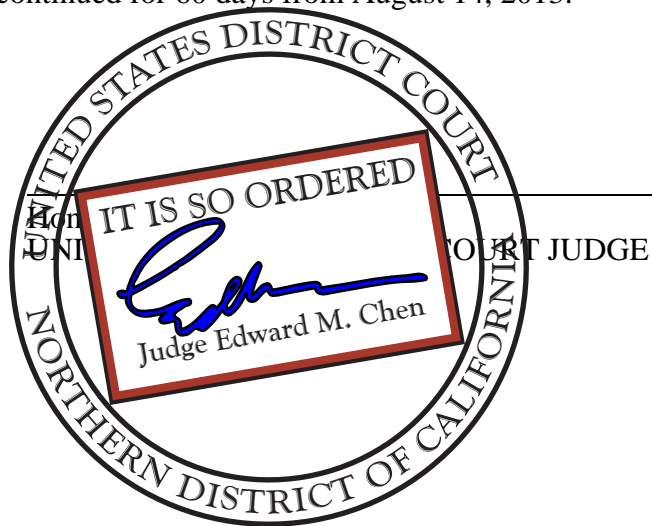
[PROPOSED] ORDER

Having reviewed the stipulation between the parties herein, IT IS HEREBY ORDERED that the Early Neutral Evaluation of this matter be continued for 60 days from August 14, 2013.

IT IS SO ORDERED.

7/23

DATED: _____, 2013



CERTIFICATE OF SERVICE

I, the undersigned, declare that I am employed in the County of San Francisco, California; I am over the age of eighteen years and not a party to the within cause; and my business address is 2749 Hyde Street, San Francisco, California 94109.

I am readily familiar with the practice of Bertrand, Fox, & Elliot with respect to the collection and processing of pleadings, discovery documents, motions and all other documents which must be served upon opposing parties or other counsel in litigation. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

On **July 22, 2013**, I served the following documents,

**STIPULATED REQUEST TO CONTINUE EARLY NEUTRAL EVALUATION
AND [PROPOSED] ORDER**

on the following interested parties:

Javier A. Alvarez *Pro Se Plaintiff*
1014 Hopper Avenue #402
Santa Rosa, California 95403
Tel: (415) 827-6322
Email: Javdog396@gmail.com

Said service was performed in the following manner:

(✓) **BY U.S. POSTAL SERVICE (Mail):** I placed each such document in a sealed envelope addressed at noted above, with first-class mail postage thereon fully prepaid, for collection and mailing at San Francisco, California, following the above-stated business practice, on this date.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed **July 22, 2013**, at San Francisco, California.

/s/ John O'Rourke

John O'Rourke